

# **EXHIBIT C**

**April 20, 2017 Weiler Email**

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**From:** Matthew Weiler [<mailto:MWeiler@saverilawfirm.com>]

**Sent:** Thursday, April 20, 2017 9:15 PM

**To:** Stacey Grigsby <[SGrigsby@BSFLLP.com](mailto:SGrigsby@BSFLLP.com)>; Kevin Rayhill <[krayhill@saverilawfirm.com](mailto:krayhill@saverilawfirm.com)>; Marcy Norwood Lynch <[mlynch@BSFLLP.com](mailto:mlynch@BSFLLP.com)>; Suzanne Jaffe Nero <[snero@BSFLLP.com](mailto:snero@BSFLLP.com)>; Nicholas Widnell <[NWidnell@BSFLLP.com](mailto:NWidnell@BSFLLP.com)>; William Isaacson <[Wisaacson@BSFLLP.com](mailto:Wisaacson@BSFLLP.com)>; Ross McSweeney <[RMcSweeney@BSFLLP.com](mailto:RMcSweeney@BSFLLP.com)>; Brent Nakamura <[bnakamura@BSFLLP.com](mailto:bnakamura@BSFLLP.com)>; Rory Skaggs <[RSkaggs@BSFLLP.com](mailto:RSkaggs@BSFLLP.com)>; Donald J. Campbell <[djc@campbellandwilliams.com](mailto:djc@campbellandwilliams.com)>; J. Colby Williams <[jcw@campbellandwilliams.com](mailto:jcw@campbellandwilliams.com)>

**Cc:** Joseph Saveri <[jsaveri@saverilawfirm.com](mailto:jsaveri@saverilawfirm.com)>; Eric L. Cramer <[ecramer@bm.net](mailto:ecramer@bm.net)>; Michael Dell'Angelo <[MDellangelo@bm.net](mailto:MDellangelo@bm.net)>; Patrick Madden <[PMadden@bm.net](mailto:PMadden@bm.net)>; Mark R. Suter ([msuter@bm.net](mailto:msuter@bm.net)) <[msuter@bm.net](mailto:msuter@bm.net)>; Richard Koffman <[RKoffman@cohenmilstein.com](mailto:RKoffman@cohenmilstein.com)>; Ben Brown <[BBrown@cohenmilstein.com](mailto:BBrown@cohenmilstein.com)>; Daniel Silverman <[DSilverman@cohenmilstein.com](mailto:DSilverman@cohenmilstein.com)>; Robert C. Maysey <[rmaysey@warnerangle.com](mailto:rmaysey@warnerangle.com)>; Jerome Elwell ([jelwell@warnerangle.com](mailto:jelwell@warnerangle.com)) <[jelwell@warnerangle.com](mailto:jelwell@warnerangle.com)>; Don Springmeyer <[DSpringmeyer@wrslawyers.com](mailto:DSpringmeyer@wrslawyers.com)>

**Subject:** RE: Le et al. v. Zuffa, LLC

Stacey,

I am available at your convenience tonight. If you would rather that I call you please let me know how to contact you.

Regards,

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**From:** Stacey Grigsby [<mailto:SGrigsby@BSFLLP.com>]

**Sent:** Thursday, April 20, 2017 5:56 PM

**To:** Matthew Weiler; Kevin Rayhill; Marcy Norwood Lynch; Suzanne Jaffe Nero; Nicholas Widnell; Bill Isaacson; Ross McSweeney; Brent Nakamura; Rory Skaggs; Donald J. Campbell; J. Colby Williams

**Cc:** Joseph Saveri; Eric L. Cramer; Michael Dell'Angelo; Patrick Madden; Mark R. Suter ([msuter@bm.net](mailto:msuter@bm.net)); Richard Koffman; Ben Brown; Daniel Silverman; Robert C. Maysey; Jerome Elwell ([jelwell@warnerangle.com](mailto:jelwell@warnerangle.com)); Don Springmeyer

**Subject:** RE: Le et al. v. Zuffa, LLC

Dear Mr. Weiler,

I believe your recollection of the conversation is not accurate—perhaps because you were busy preparing for the deposition that day. In any event, it makes little sense to trade emails over certain factual issues that can be easily verified.

I am on a flight at the moment and unable to talk on the phone for at least two hours. If you would

like to discuss later this evening or tomorrow, we are more than happy to do so.

Warm regards,

Stacey

**Stacey K. Grigsby**

Partner

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**From:** Matthew Weiler [<mailto:MWeiler@saverilawfirm.com>]

**Sent:** Thursday, April 20, 2017 8:47 PM

**To:** Stacey Grigsby; Kevin Rayhill; Marcy Norwood Lynch; Suzanne Jaffe Nero; Nicholas Widnell; William Isaacson; Ross McSweeney; Brent Nakamura; Rory Skaggs; Donald J. Campbell; J. Colby Williams

**Cc:** Joseph Saveri; Eric L. Cramer; Michael Dell'Angelo; Patrick Madden; Mark R. Suter ([msuter@bm.net](mailto:msuter@bm.net)); Richard Koffman; Ben Brown; Daniel Silverman; Robert C. Maysey; Jerome Elwell ([jelwell@warnerangle.com](mailto:jelwell@warnerangle.com)); Don Springmeyer

**Subject:** RE: Le et al. v. Zuffa, LLC

Stacy,

My recollection of the events is that Kevin asked you for deposition dates in May and Zuffa refused. As Zuffa had prior to April 19 confirmed no dates, there was nothing to "move."

The bases of prejudice are multiple.

First, two business days of noticed confirmation do not provide enough time to prepare for Mr. Hendrick's deposition.

Second, Mr. Hendrick was heavily involved in the Mercer project, which is subject to Plaintiffs' motion to challenge privilege. This motion is pending before the Court. The parties had previously agreed to move the 30(b)(6) on fighter compensation, and Mr. Hendrick's deposition, until these issues had been resolved.

Third, Plaintiffs have identified multiple issues with Zuffa's privilege log. Both Mr. Hendrick and Mr. Epstein are attorneys. These issues should be resolved prior to either deposition.

If you would like to discuss these issues further please call me at 310-383-5733. We will file our motion tonight or early tomorrow and ask for a telephone conference at the Court's earliest convenience tomorrow. Please let us know if there are any times that are more convenient for Zuffa for a call with the Court.

Regards,

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**From:** Stacey Grigsby [<mailto:SGrigsby@BSFLLP.com>]  
**Sent:** Thursday, April 20, 2017 5:37 PM  
**To:** Matthew Weiler; Kevin Rayhill; Marcy Norwood Lynch; Suzanne Jaffe Nero; Nicholas Widnell; Bill Isaacson; Ross McSweeney; Brent Nakamura; Rory Skaggs; Donald J. Campbell; J. Colby Williams  
**Cc:** Joseph Saveri; Eric L. Cramer; Michael Dell'Angelo; Patrick Madden; Mark R. Suter ([msuter@bm.net](mailto:msuter@bm.net)); Richard Koffman; Ben Brown; Daniel Silverman; Robert C. Maysey; Jerome Elwell ([jelwell@warnerangle.com](mailto:jelwell@warnerangle.com)); Don Springmeyer  
**Subject:** RE: Le et al. v. Zuffa, LLC

Dear Mr. Weiler,

We are truly confused by your response below. Yesterday, Kevin Rayhill asked me if we could discuss "moving" the Hendrick, Hertig, and Epstein depositions to the first or second week in May. The choice of the word "moving" certainly indicates that Plaintiffs understood that the depositions were scheduled to proceed the week of April 24.

If Plaintiffs had no intention of proceeding on the April 24<sup>th</sup> and April 28<sup>th</sup> dates, it would have been prudent (and a professional courtesy) to contact Zuffa immediately instead of waiting until Wednesday, April 19<sup>th</sup>. Our attorneys and the witnesses have made arrangements to attend these depositions, including booking travel and lodging.

We certainly wish to be reasonable, but please let us know how proceeding on the dates Plaintiffs noticed would prejudice Plaintiffs.

Warm regards,  
Stacey

**Stacey K. Grigsby**

Partner

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**From:** Matthew Weiler [<mailto:MWeiler@saverilawfirm.com>]  
**Sent:** Thursday, April 20, 2017 7:38 PM  
**To:** Stacey Grigsby; Kevin Rayhill; Marcy Norwood Lynch; Suzanne Jaffe Nero; Nicholas Widnell; William Isaacson; Ross McSweeney; Brent Nakamura; Rory Skaggs; Donald J. Campbell; J. Colby Williams  
**Cc:** Joseph Saveri; Eric L. Cramer; Michael Dell'Angelo; Patrick Madden; Mark R. Suter ([msuter@bm.net](mailto:msuter@bm.net)); Richard Koffman; Ben Brown; Daniel Silverman; Robert C. Maysey; Jerome Elwell ([jelwell@warnerangle.com](mailto:jelwell@warnerangle.com)); Don Springmeyer  
**Subject:** RE: Le et al. v. Zuffa, LLC

Stacy,

As I told you yesterday, Plaintiffs were surprised to hear Zuffa state that it was making these witnesses available. These depositions were noticed on April 7, and we heard nothing from Zuffa until April 19. Zuffa waited to inform Plaintiffs until there was only two business days before Mr. Hendrick's deposition. This is gamesmanship, and it is disappointing given how accommodating Plaintiffs have been to Zuffa throughout the course of discovery. This is prejudicial, and gives Plaintiffs insufficient time to prepare, in light of the other depositions scheduled for this week and Scheduled by Zuffa for the first week of May. Plaintiffs will seek immediate relief from the Court by emergency motion.

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**From:** Stacey Grigsby [<mailto:SGrigsby@BSFLLP.com>]

**Sent:** Thursday, April 20, 2017 4:28 PM

**To:** Kevin Rayhill; Marcy Norwood Lynch; Suzanne Jaffe Nero; Nicholas Widnell; Bill Isaacson; Ross McSweeney; Brent Nakamura; Rory Skaggs; Donald J. Campbell; J. Colby Williams

**Cc:** Joseph Saveri; Matthew Weiler; Eric L. Cramer; Michael Dell'Angelo; Patrick Madden; Mark R. Suter ([msuter@bm.net](mailto:msuter@bm.net)); Richard Koffman; Ben Brown; Daniel Silverman; Robert C. Maysey; Jerome Elwell ([jelwell@warnerangle.com](mailto:jelwell@warnerangle.com)); Don Springmeyer

**Subject:** RE: Le et al. v. Zuffa, LLC

Counsel,

As we confirmed yesterday with Mr. Weiler and Mr. Rayhill, Mr. Hendrick and Mr. Epstein have cleared their schedules to make themselves available to be deposed on the April 24 and April 28, respectively, which are the dates Plaintiffs noticed. Zuffa is ready to proceed and cannot agree to move these depositions at this late date.

Best,

Stacey

**Stacey K. Grigsby**

Partner

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**From:** Kevin Rayhill [<mailto:krayhill@saverilawfirm.com>]

**Sent:** Friday, April 07, 2017 7:27 PM

**To:** Marcy Norwood Lynch; Stacey Grigsby; Suzanne Jaffe Nero; Nicholas Widnell; William Isaacson; Ross McSweeney; Brent Nakamura; Rory Skaggs; Donald J. Campbell; J. Colby Williams

**Cc:** Joseph Saveri; Matthew Weiler; Eric L. Cramer; Michael Dell'Angelo; Patrick Madden; Mark R. Suter ([msuter@bm.net](mailto:msuter@bm.net)); Richard Koffman; Ben Brown; Daniel Silverman; Robert C. Maysey; Jerome Elwell ([jelwell@warnerangle.com](mailto:jelwell@warnerangle.com)); Don Springmeyer

**Subject:** Le et al. v. Zuffa, LLC

Counsel,

Please see the attached deposition notices. Please also take notice of the attached third party subpoena for Gary Ibarra, which will be served today.

Sincerely,

Kevin E. Rayhill  
t 415.500.6800 x804  
f 415.395.9940  
[krayhill@saverilawfirm.com](mailto:krayhill@saverilawfirm.com)

**JOSEPH SAVERI**  
**LAW FIRM**

555 Montgomery Street, Suite 1210  
San Francisco, CA 94111

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